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FAA-98-4390-54

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Sender: "Dowd Diane (CORP)" <diane.dowd@corporate.ge.com>
To: 9-NPRM-CMTS
Priority: Normal
Subject: Comments on Docket No. FAA-98-4390; Notice No. 99-10

OFFICE OF THE
CHIEF COUNSEL
RULES DOCKET

1999 AUG 11 P 12:43

US Dept of Transportation Dockets
Docket No. FAA-98-4390
400 Seventh St., SW
Room. Plaza 401,
Washington, DC 20590

Attached is a document containing the comments by the Eastern Region
Helicopter Council on Docket No. FAA 98-4390; Notice No. 99-10, RIN
2120-AG53

Flight Plan Requirements for Helicopter Operations Under
Instrument Flight Rules.

If you have any trouble opening this document, please let me know.

Diane C. Dowd
Chairman, Eastern Region Helicopter Council
7-12-99.doc>>
914-287-6643

<<SNPRM FAR91.169



RFC822.TXT



SNPRM FAR91 169

7-12-99 doc

July 28, 1999
US DOT Dockets
Docket No. FAA-98-4390
400 Seventh Street SW
Room Plaza 401
Washington DC 20590

Regarding: Comment in Support of Supplemental Notice of Proposed
Rulemaking: *"Flight Plan Requirements for Helicopter
Operations Under Instrument Flight Rules."*
Docket No. FAA-98-4390
Notice No. 99-10, 64 Fed. Reg. 35902 (July 1, 1999)

Dear Madam Administrator:

I am writing in support of the above cited SNPRM on behalf of the Eastern Region Helicopter Council. The Eastern Region Helicopter Council is made of up of seventy corporate, commercial, and private helicopter operators who fly in the New York Metropolitan area. Our organization promotes the safe and efficient use of helicopters.

The Eastern Region Helicopter Council supports the FAA in its endeavor to define rules that acknowledge the unique characteristics of helicopters. Many of our members operate twin turbine, IFR certified helicopters. The rule changes proposed in this SNPRM would provide our members increased utilization of their helicopters because they would have greater access to the IFR system than under current rules. Therefore, our members will increase the productivity of their helicopters in which they have made a substantial financial investment

The Eastern Region Helicopter Council believes that this rule change will enhance aviation safety by making the IFR system more accessible to helicopters. As the FAA has stated, helicopters have unique flying characteristics which allow them to fly straight in approaches with no necessity to circle to land. Therefore, there is no reason to restrict helicopters to operate under regulations that are written to address airplane operating limitations which require circle to land maneuvers.

As well as enhancing safety, increasing access to the IFR system also addresses one of the major issues faced by helicopter operators here in the New York area , which is aircraft noise. Flying at IFR altitudes rather than flying low level to remain below clouds reduces the noise impact of helicopters to people on the ground. The Eastern Region Helicopter Council conducts an extensive Fly Neighborly Program by encouraging our

members and all helicopter pilots to fly at higher altitudes to mitigate the effects of helicopter noise. Flying IFR will definitely help with efforts to decrease aircraft noise.

The Eastern Region Helicopter Council wishes to acknowledge the dedication of the FAA personnel who have worked diligently on the NPRM and SNPRM.

The Helicopter Council supports the content of the SNPRM. We have a question, however, about the wording of 91.169(c)(1)(ii). We believe that the intent of the rule change is to stipulate that weather at the alternate airport for a helicopter must be Ceiling 200 feet above the approach minimum for the approach to be flown, and visibility at least one mile, but never less than the helicopter visibility for the approach to be flown. The ERHC believes it is necessary to make a change in the wording of this paragraph of the SNPRM in order to secure the intent of the original NPRM. The ERHC proposes the following change in the wording of the SNPRM:

91.169(c)(1)(ii): For helicopters: Ceiling 200 feet above the approach minimum for the approach to be flown, and visibility at least 1 statute mile but never less than the helicopter visibility for the approach to be flown, and . . .

The SNPRM FAA -98-4390 represents a major step toward using the full capabilities of helicopters. We at ERHC applaud the FAA for their willingness to work with the helicopter industry and to listen and respond to the concerns of the helicopter community. The Eastern Region Helicopter Council thanks all of the FAA personnel who contributed to this major step forward for the helicopter industry.

Very truly yours,

Diane C. Dowd
Chairman, Eastern Region Helicopter Council